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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

10 THE UNITED STATES OF AMERICA,) **No. CR-08-0477 DLJ**
11 Plaintiff,)
12 vs.) STIPULATION AND
13 NELDA ASUNCION,) [PROPOSED] ORDER FOR
14 Defendant.) PERMISSION TO TRAVEL
) OUT OF NORTHERN DISTRICT

16 The Defendant NELDA ASUNCION, through her counsel, DEBORAH G. LEVINE and
17 Assistant United States Attorney, DEBORAH R. DOUGLAS, do hereby stipulate that Defendant,
18 Nelda Asuncion, be permitted to travel out of the Northern District on or about August 8, 2010 and
19 return on or about August 22, 2010 to visit her son, Ernel Asuncion and her grandchildren and other
20 relatives near Chicago, Illinois in Evanston, Illinois. She will be staying at the home of her son, at
21 1135 Maple Ave., Unit G, Evanston, Illinois 60202.

22 The defendant is currently in compliance with the conditions of her pre-trial release. United
23 States Pre-Trial Service Officer Tim Elder was informed of these travel plans and he has no objection
24 as long as Mrs. Asuncion provides details of her travel plans and continues to remain in contact by
25 telephone with pre trial services as required. All other release conditions to remain unchanged.

26 For the forgoing reasons, the parties stipulate and agree that Nelda Asuncion be permitted to
27 travel out of the Northern District of California to Evanston, Illinois near Chicago, Illinois on or
28 about August 8, 2010 and return on or about August 22, 2010, 2009.

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2 IT IS SO STIPULATED:
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4 Dated: July 6, 2010
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/s/ Deborah R. Douglas
DEBORAH R. DOUGLAS
Assistant United States Attorney

6 Dated: July 6, 2010
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/s/ Deborah G. Levine
DEBORAH G. LEVINE
Attorney for Nelda Asuncion

8
9 **[PROPOSED] ORDER**
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11 UPON STIPULATION OF THE PARTIES AND FOR GOOD CAUSE SHOWN, THE COURT
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13 HEREBY AUTHORIZES NELDA ASUNCION TO TRAVEL OUT OF THE NORTHERN
14 DISTRICT OF CALIFORNIA ON OR ABOUT AUGUST 8, 2010 AND RETURN NO LATER
15 THAN AUGUST 22, 2010 TO VISIT HER SON AND GRANDCHILDREN IN EVANSTON,
16 ILLINOIS (CHICAGO). ALL TRAVEL DETAILS SHALL BE PROVIDED TO PRE TRIAL
17 SERVICES BEFORE LEAVING THE NORTHERN DISTRICT. ALL OTHER RELEASE
18 CONDITIONS REMAIN UNCHANGED.
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21 IT IS SO ORDERED

22 Dated: July 13, 2010
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LAUREL BEELER
U.S. MAGISTRATE JUDGE
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